

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER MDL NO. 19-2875 (RBK)

**PLAINTIFFS' NOTICE OF CROSS MOTION
TO EXCLUDE DR. AFNAN'S OPINIONS
THAT RELY ON DR. XUE'S EXCLUDED OPINIONS**

TO: Jessica Davidson, Esq,
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
One Manhattan West
New York, New York 10001
Attorneys for Defendants

PLEASE TAKE NOTICE that Plaintiffs shall cross move before the Honorable Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order excluding the Dr. Afnan's opinions that rely on Dr. Xue's excluded opinions.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the Brief, Certification of Adam M. Slater, and proposed order in opposition to the ZHP Defendants' motion and in support of their cross motion.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: February 6, 2024

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2024, I electronically filed a partially redacted version of the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL. In addition, I hereby certify that unredacted copies of foregoing documents, excluding the exhibits, will be served contemporaneous to filing via email on the Court, Special Master, and Jessica Davidson at Jessica.Davidson@skadden.com, Lori Cohen at CohenL@gtlaw.com, and Jay Lefkowitz at lefkowitz@kirkland.com. The exhibits will be sent via FedEx to the Court via a thumb drive, and emailed to the Special Master and Jessica Davidson at Jessica.Davidson@skadden.com, Lori Cohen at CohenL@gtlaw.com, and Jay Lefkowitz at lefkowitz@kirkland.com using a Dropbox link.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: February 6, 2024